

Affidavit

United States of America _____) ss
_____, District of _____)

Jo

1 I, Gerald Armstrong, currently a _____, state that:

2 I reside at _____

3 _____ paralegal working at the law

4 firm of Flynn + Joyce at 400 Atlantic Ave.

5 in Boston, MA, make the following statement

6 to Kenneth Legerle and Forest E. Wright, who

7 have identified themselves to me as Internal

8 Security Inspectors of the IRS. From 1969 through

9 several of those years worked directly for

10 the Founder of the organization, L. Ron Hubbard.

11 As a result of my past association with

12 Scientology and Mr. Hubbard I was contacted

13 by the Criminal Investigator Division of the

14 IRS. I was first contacted by IRS agents

15 in about August or September 1984, after the

16 conclusion of a civil trial in the case of

17 Church of Scientology of California v. Gerald

18 Armstrong in the Los Angeles Superior Court,

19 Case No. C420153. My attorney, Michael

20 Flynn had been contacted by the IRS agents,

21 and he had told them to call me. An

22 initial meeting was held in the IRS office in

23 Los Angeles with CID agents Al Lister and

24 Al Ristuccia. All they told me was

25 that they were conducting an investigation.


26 They asked me a lot of questions concerning

27 my history in the various Scientology org -

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1 organization and the various positions I had
2 held. They said they were not investigating
3 the subject of Scientology, and I surmised it
4 was a tax matter, but they gave me no
5 specifics. I subsequently had approximately
6 4 meetings with them, probably three in 1984,
7 and 1 in 1985. There were occasions when I
8 spoke to them by telephone. Usually the
9 telephone calls were to clarify a point of
10 information. In about May of 1984, I was contacted
11 by a friend of several years, Don Hermon, who told
12 me of a group of Scientologists who called them-
13 selves "Loyalists", who were seeking to reform the
14 organization and discontinue its illegal and tyr-
15 annical practices. Later I was contacted directly
16 by a member of the "Loyalists". He suggested to me
17 a plan of planting false and incriminating documents
18 in the Scientology organization and I told
19 him I wanted no part of it. The Loyalists
20 expressed a concern about their safety and I
21 told this to Liskin and Pistuccia. They told
22 me to have these people contact them and they
23 would be interviewed as witnesses. In that manner
24 they could be afforded Government protection as
25 witnesses. Pistuccia and Liskin had told me that
26 if I was ever threatened because of my contact with

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1 then they (CID) should immediately be notified.
2 I gave the telephone numbers for CID to the
3 "Loyalists" so they could telephone them if they
4 wished to be interviewed. I was never paid or
5 compensated in any way by CID for any information
6 furnished to them. During the initial contact
7 I was in the IRS office over the lunch hour
8 and we went to lunch together. They picked
9 up the tab for lunch and I imagine mine
10 would have been no more than \$4.00. I have
11 never been given or promised anything else of value.
12 I have never been asked or encouraged to do any-
13 thing illegal or improper by the CID agents such
14 as stealing or forging documents or planting doc-
15 uments in the files of anyone. I have never been
16 given instructions by CID to obtain any specific
17 information from any Scientologist. CID asked
18 me for the current positions of three people,
19 Steve Marlowe, Wendell Reynolds and Doug Hoy.
20 I did not know, but I asked about this,
21 on my own volition, in a conversation with
22 one of the "Loyalists". I don't believe they
23 provided me with the information, so I was
24 unable to give CID anything. I have been
25 shown copies of some handwritten notes which
26 I gave to Don Sherman, which ask for certain

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1 information, but this was for my own information and
2 definitely was not something that CID agents had
3 asked me to obtain. On my own, without any
4 request by CID, I voluntarily gave them documents
5 on IHLP which were furnished to me by the
6 "loyalists." I was not requested by CID to get
7 them or to give them to the IRS. The CID
8 agents were very close-mouthed about all aspects
9 of their investigation and they never gave
10 me any information concerning it. The
11 only time I learned anything at all
12 was when they would ask me questions
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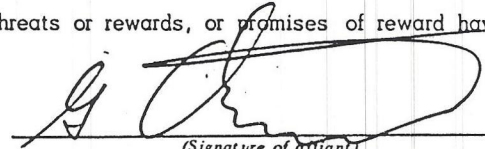
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I have read the foregoing statement consisting of 4 pages, each of which I have signed. I fully understand this statement and it is true, accurate and complete to the best of my knowledge and belief. I made the corrections shown and placed my initials opposite each.

I made this statement freely and voluntarily without any threats or rewards, or promises of reward having been made to me in return for it.

Subscribed and sworn to before me this 19th
day of September, 1985,
at Boston, Ma.


(Signature of affiant)

Kenneth E. Leyerle
(Signature)
Special Investigator
(Title)
Internal Revenue Service

Forest P. Wright (F.S.)
(Signature of witness, if any)